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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MERRILL LYNCH BUSINESS
FINANCIAL SERVICES INC.,

Plaintiff,

vs.

ARTHUR KUPPERMAN; E. ROSS
BROWNE; PAULETTE KRELMAN,
PGB INTERNATIONAL, LLC; and JP
MORGAN CHASE BANK, NATIONAL
ASSOCIATION,

Defendants.

Docket No: 06-CV-4802 (DMC)

**NOTICE OF MOTION FOR LEAVE TO FILE
A SECOND AMENDMENT TO
VERIFIED COMPLAINT**

To: All Persons On The Attached Service List

Counsel:

PLEASE TAKE NOTICE that on Monday, November 26, 2007 at 10:00 a.m. or as soon thereafter as counsel may be heard, Plaintiff Merrill Lynch Business Financial Services Inc. ("MLBFS"), by and through its attorneys, Bressler, Amery & Ross, P.C., shall move before the Honorable Dennis M. Cavanaugh, U.S.D.J., at the United States District Court for the District of New Jersey, 451 U.S. Post Office and Courthouse

Building, Federal Square, Newark, New Jersey, for an Order pursuant to Fed. R. Civ. P. 15 granting MLBFS leave to file a Second Amendment To Verified Complaint.

In support of this motion, MLBFS shall rely upon the Declaration of George R. Hirsch, Esq. and Brief submitted herewith. A copy of the proposed Second Amendment To Verified Complaint is annexed hereto.

A proposed form of Order is also submitted herewith.

BRESSLER, AMERY & ROSS, P.C.
Attorneys for Plaintiff

By: 
George R. Hirsch

Dated: October 29, 2007

**MERRILL LYNCH BUSINESS FINANCIAL SERVICES, INC. vs.
ARTHUR KUPPERMAN, ET AL.**

CIVIL ACTION NO: 06-4802 (DMC)

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